

EXHIBIT E

[REDACTED]

From: Zula, Heidi <hzula@co.schuylkill.pa.us>
Sent: Thursday, June 10, 2021 9:26:36 AM
To: **Jane Doe**
Subject: RE: Investigation

Jane Doe

Your request for an independent witness is denied. There will be another witness from the Human Resources Office present during the meeting so you will not be meeting with me alone regardless if you choose to have a union representative present. Please plan to be present at the meeting today at 11:45 AM at your office in the 410 Building. Your failure to participate in the meeting will result in the completion of the investigation without your input.

Thank you,

Heidi

From: **Jane Doe**
Sent: Thursday, June 10, 2021 9:21 AM
To: Zula, Heidi <hzula@co.schuylkill.pa.us>
Subject: Re: Investigation

Heidi,

I am concerned about your impartiality and retaliation that you and others may engage in as result of my claims. This fear is warranted given the retaliatory behavior you engaged in towards **Witness Doe 2** and **Witness Doe 3**. As such, I will not participate in a meeting or interview with just you. Given the sensitive nature of the topic and what I have been through I am not comfortable with having a union representative or Andrew Kozlosky present. I am in no way am I abandoning my claims or my right to have this harassment investigated. I am asking the County to address the concerns I raised in my emails related to Mr. Halcovage and those raised by **Witness Doe 1** related to Mr. Hatter. I am also renewing my request yet again to receive a response to my reasonable accommodation request. Should the County refuse to do so, I will pursue all recourse against the County that I am entitled to under the law.

When Kathleen Gillespie reported an issue with **Witness Doe 3** and **Witness Doe 2** you were not the individual who conducted the interview. However, you were the witness. Kathleen was a union employee, like I, and unless I am mistake you are not a union steward or representative. As such, I am requesting I be treated equally or at the very least be provided a legitimate reason that I am not permitted to have a witness of my own choosing?

Thank you,

Jane Doe

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From: Zula, Heidi <hzula@co.schuylkill.pa.us<mailto:hzula@co.schuylkill.pa.us>>
Sent: Thursday, June 10, 2021 8:32:59 AM
To: **Jane Doe**
Subject: RE: Investigation

Hi Jane Doe

Unfortunately, the only witness you would be entitled to bring to the meeting would be your union representative or a union steward. If you do not feel comfortable with a steward serving as your witness, Andrew Kozlosky as the AFSCME representative will be available later today to sit in on the meeting. I have a meeting with another employee at 11 AM and then I can meet with you following that as Andrew will be available. We will reschedule our meeting to 11:45 AM this morning in your office at the 410 Building. Please make arrangements to attend. Please plan to be present at the meeting tomorrow at 11 AM at your office in the 410 Building. Your failure to participate in the meeting will result in the completion of the investigation without your input.

Thank you,

Heidi

From: **Jane Doe**

Sent: Thursday, June 10, 2021 8:15 AM

To: Zula, Heidi <hzula@co.schuylkill.pa.us<mailto:hzula@co.schuylkill.pa.us>>

Subject: Investigation

Hi Heidi,

I'm not comfortable with a union steward because of the sensitivity of all that is going on. I would like an unbiased witness of my choosing. Please advise if the meeting will still take place at 8:45 am?

Thank You